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16 **UNITED STATES DISTRICT COURT**  
17 **EASTERN DISTRICT OF CALIFORNIA**

18  
19 KATHLEEN VICTORIA ESPARZA, } Case No.: 2:23-CV-00681-AC  
20 Plaintiff, } STIPULATION AND [PROPOSED] ORDER  
21 vs. } FOR AN EXTENSION OF TIME  
22 KILOLO KIJAKAZI, }  
23 Acting Commissioner of Social Security, }  
24 Defendant. }

25 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the  
26 parties, through their respective counsel of record, that the time for Defendant to respond to  
27 Plaintiff's Motion for Summary Judgment be extended thirty (30) days from September 11, 2023  
28 up to and including October 11, 2023. This is the Defendant's first request for an extension.

29 Defendant requests this extension in order to further consider the more than 2,700 page  
30 administrative record in light of the issues raised in Plaintiff's motion. The undersigned has a  
31 number of competing deadlines in pending disability cases, and was out of the office from  
32 August 28, 2023, until September 5, 2023.

33 The parties further stipulate that the Court's Scheduling Order shall be modified  
34 accordingly.

1 Respectfully submitted,

2 Dated: September 6, 2023

/s/ Meghan O. Lambert\*

3 (\*as authorized via e-mail on September 6, 2023)

4 MEGHAN O. LAMBERT

Attorney for Plaintiff

5 Dated: September 6, 2023

PHILLIP A. TALBERT

6 United States Attorney

7 MATHEW W. PILE

8 Associate General Counsel

9 Social Security Administration

10 By: /s/ Erin A. Jurrens

11 ERIN A. JURRENS

12 Special Assistant U.S. Attorney

13 Attorneys for Defendant

14 **ORDER**

15 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an  
16 extension, up to and including October 11, 2023, to respond to Plaintiff's Motion for Summary  
17 Judgment.

18 DATED: September 5, 2023.

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20   
21 ALLISON CLAIRE  
22 UNITED STATES MAGISTRATE JUDGE